

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MARISA WOODHOUSE, on behalf of)	
herself and others similarly situated,)	
)	
Plaintiffs,)	
v.)	No. 09-C 5593
)	
LINEBARGER GOGGAN BLAIR &)	Judge Pallmeyer
SAMPSON, LLP,)	
)	
Defendant.)	
)	

**AGREED MOTION TO EXTEND CLASS CERTIFICATION BRIEFING BY 30 DAYS
AND DISCOVERY BY 60 DAYS.**

NOW COMES Defendant, LINEBARGER GOGGAN BLAIR & SAMPSON, LLP, by and through its undersigned attorney, and pursuant to FRCP 6(e), moves this Honorable Court to extend the time class certification briefing by 30 days and discovery by 60 days, and in support states the following:

1. This is an agreed motion.
2. Plaintiff Marisa Woodhouse has now filed a Third Amended Complaint to redress purported negligent and wilful violations violation of the Telephone Consumer Protection Act, 47 U.S.C. § 227 ("TCPA").
3. Defendant has answered the Third Amended Complaint as well as discovery requests. The parties spoke on April 16, 2010 to discuss discovery objections and related issues.
4. Plaintiff's Motion for Class Certification is pending, and Plaintiff is required to respond by April 30, 2010. Defendant's Response is due on June 30, 2010 and Plaintiff's Reply is due on July 16, 2010. Additionally, discovery is set to close on May 30, 2010. Dkt. No. 7.
5. This extension is sought by the parties to narrow discovery issues and to allow additional time to coordinate a FRCP 30(b)(6) deposition of Defendant.

6. Accordingly, no harm or prejudice will result from granting this motion.

WHEREFORE, for the reasons set forth above, Defendant, LINEBARGER GOGGAN BLAIR & SAMPSON, LLP, requests this Honorable Court issue an order extending following dues dates related to Plaintiff's Motion for Class Certification: (1) Memorandum in support of motion for class certification to be filed by or on May 30, 2010; (2) Response July 30, 2010; and (3) Reply August 16, 2010. Additionally, the parties ask this Court to extend the discovery cutoff until July 30, 2010.

Respectfully submitted,

/s/ James C. Vlahakis
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CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2010, I electronically filed the above document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

Respectfully submitted,

/s/ James C. Vlahakis
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